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**March 28, 2011**

**VIA ELECTRONIC MAIL  
and ECFS**

Joel Gurin  
Chief - Consumer Governmental Affairs Bureau  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

**RE: Recent Sorenson Ex Parte**

Dear Mr. Gurin,

This letter is offered in response to the latest ex parte submitted to the record by Sorenson Communications on March 21, 2011. While CSDVRS appreciates and promotes open dialogue, it would seem that this latest Sorenson offering is nothing more than a thinly veiled attack on CSDVRS.

In prior filings, Sorenson stated that it has its interpreters annotate “busy” and “no answer” calls to be pulled from its reimbursement schedule (i.e. note them as non-compensable calls). Yet, despite all of the vitriolic language Sorenson has included in its March 21 ex parte, it did not explain why a system that starts a conversation at the industry standard “answer supervision” would need to have the video interpreters mark “busy” and “no answer” as non-compensable. Indeed, if Sorenson utilizes the “answer supervision” standard, there is no need to mark these calls and CSDVRS would apologize for this misunderstanding.

In regard to podcasts, the Commission has provided some guidance about the scope of permissible consumer initiated VRS calls to podcasts. However, CSDVRS has experienced withholding of compensation for its customer’s calls to podcasts pending the Commission’s review. While this review is pending, CSDVRS has not submitted calls to podcasts for compensation. The CSDVRS system prevents any podcast call from reaching the call detail



records that are submitted to the Fund Administrator for compensation. The comment Sorenson referred to regarding podcasts was to reiterate for the record that CSDVRS does not agree that all podcasts should be disallowed, however, CSDVRS hopes that the Commission will soon clarify its position by allowing for the compensation of legitimate podcast calls.

Sorenson states in its ex parte that it does not “second guess” its interpreters, yet cites instances where the interpreter directly intervenes. One in regard to marking calls “busy” or “no answer” and the other concerning test calling. CSDVRS is confused as to why Sorenson interpreters would mark test calls after the call if it does not second guess its interpreters nor place them in the middle of judging the compensability of calls. CSDVRS submits that a simple solution to this would be to maintain a set of telephone numbers or URLs that are not billed and have all test calls made to those numbers/URLs.

Lastly, given the generally volatile operations of the VRS marketplace, CSDVRS would submit that legal counsel should reflect on matters raised in provider filings before submitting a vitriolic and contemptuous filing to the public record. CSDVRS believes many issues can be easily settled between providers without the need to involve the Commission. CSDVRS is willing to work with any provider in resolving any misunderstandings without Commission intervention and it challenges Sorenson to do the same.

Sincerely yours,

/s/

Sean Belanger  
CEO, CSDVRS